

March 28, 2017
LETTER-MOTION – FILED VIA ECF

The Honorable Gregory H. Woods
U.S. District Judge, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Re: *Johnson v. Interactive One, LLC*
Civil Action No. 1:16-cv-07204-GHW
Letter-Motion to Stay Proceedings

Dear Judge Woods,

We represent the Plaintiff, Eric Johnson (“Plaintiff”), in the above-captioned action. Pursuant to Rules 5.2 and 7.1 of the Local Rules of the U.S. District Court for the Southern District of New York and Rule 13.1 of the Electronic Case Filing Rules & Instructions of the U.S. District Court for the Southern District of New York, Plaintiff, by and through his undersigned attorney, and with the consent of the Defendant, Interactive One, LLC (“Defendant”), hereby respectfully moves the Court for issuance of a 30-day stay of proceedings. The basis for this request is that the parties have reached a settlement in principle, and are currently in the process of negotiating and drafting final settlement terms.

This is the parties’ first request for a stay since reaching a settlement in principle of this matter. Defendant’s counsel has consented to the instant request.

Thank you for your time and consideration.

Very truly yours,



Alexander Malbin, Esq.
Ferdinand IP, LLC
125 Park Avenue
25th Floor, Suite 2508
New York, NY 10017
(p) (212) 220-0523
(f) (203) 905-6747
amalbin@24iplg.com
Counsel for Plaintiff, Eric Johnson

NEW YORK OFFICE
125 PARK AVENUE, 25TH FL
NEW YORK, NY 10017
P +1 (212) 520 4296
F +1 (203) 905 6747

WESTPORT OFFICE
129 POST ROAD EAST
WESTPORT, CT 06880
P +1 (203) 557 4224
F +1 (203) 905 6747

LOS ANGELES OFFICE
604 ARIZONA AVENUE
SANTA MONICA, CA 90401
P +1 (323) 872 0660
F +1 (203) 905 6747

SILICON VALLEY OFFICE
800 W EL CAMINO REAL, STE 180
MOUNTAIN VIEW, CA 94040
P +1 (650) 903 2201
F +1 (203) 905 6747

LA JOLLA OFFICE
2255 AVENIDA DE LA PLAYA, STE 3
LA JOLLA, CA 92037
P +1 (858) 412 4515
F +1 (203) 905 6747